



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF REGIONAL OFFICES
SUFFOLK REGIONAL OFFICE

August 11, 2022

The Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-9014

Re: *Chrysafis v. Marks*, No. 2:21-cv-2516 (E.D.N.Y.) (GRB) (AYS)

Dear Judge Brown:

I write on behalf of all parties, pursuant to Your Honor's Individual Rule No. 1, to request a further modification of the stipulated briefing schedule on Plaintiffs' anticipated motion for attorneys' fees in the above captioned action. While the parties had previously expected to finalize a settlement ahead of the current deadline for service of opening briefs, the State is still working to secure various internal approvals at each stage in the negotiations, and that internal approval process is taking more time than originally anticipated. Notwithstanding the length of this process, there has been no change in the parties' position as to the substantial progress made in the negotiations or the expectation that a settlement will ultimately be finalized.

Pursuant to the current stipulated schedule, which the Court so-ordered on July 8, 2022, motion papers are to be served on or before August 25, 2022; opposition papers are to be served on or before October 13, 2022; reply papers are to be served on or before November 10, 2022; and Plaintiffs are to file all motion papers, per the Court's Individual Rule No. 2(a), on November 11, 2022. In order to afford the State additional time to secure the requisite approvals, the parties have stipulated to the following further revised briefing schedule:

- Motion papers served on or before September 15, 2022.
- Opposition papers served on or before November 3, 2022.
- Reply papers served on or before December 8, 2022.
- Plaintiffs to file all motion papers, per the Court's Individual Rule No. 2(a), on December 9, 2022.

Thank you for your consideration of this matter.

Very truly yours,

A handwritten signature in black ink that reads "Susan M. Connolly". The signature is written in a cursive, flowing style.

SUSAN M. CONNOLLY
Assistant Attorney General

cc: counsel via ecf